

United States District Court

T.P.
(emailed)

SOUTHERN

DISTRICT OF

OHIO

In the Matter of the Seizure of
(Address or brief description of property or premises to be seized)

2002 Isuzu Axiom, Serial Number
4S2DF58X524605162, Ohio license plate
number FCQ3646, white in color

APPLICATION AND AFFIDAVIT FOR SEIZURE WARRANT

CASE NUMBER: 2:12-mj-211

I Jason R. Burns

being duly sworn depose and say:

I am a(n) Special Agent, Bureau of Alcohol Tobacco and have reason to believe
Firearms and Explosives

Official Title

that in the Southern District of Ohio

there is now certain property which is subject to forfeiture to the United States, namely a

2002 Isuzu Axiom, Serial Number 4S2DF58X524605162, Ohio license plate
number FCQ3646, white in color

which is (state one or more bases for seizure under the United States Code) 18 USC 981 and 982

concerning a violation of Title 18 United States code, Section(s) 1956 (a) (1) (B) (i)

The facts to support a finding of Probable Cause for issuance of a Seizure Warrant are as follows:

See attached affidavit of Special Agent Jason R. Burns

Continued on the attached sheet and made a part hereof:

Yes No

Signature of Affiant

Sworn to before me and subscribed in my presence,

3/29/12

Date

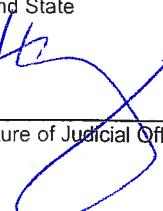
Norah McCann King, U.S. Magistrate Judge

Name and Title of Judicial Officer

at Columbus, Ohio

City and State

Signature of Judicial Officer



Affidavit for Seizure Warrant

I, Jason R. Burns, being duly sworn, depose and say as follows:

I.

Property to be Seized

I make this affidavit in support of an application for the issuance of a seizure warrant for the following:

2002 Isuzu Axiom, Serial Number 4S2DF58X524605162, Ohio license plate number FCQ3646, white in color

II.

Outline/Background

I, believe, based upon the facts detailed in the affidavit, that probable cause exists that the 2002 Isuzu Axiom described in Section I is among the fruits, evidence, and the instrumentality's of criminal offenses against the United States, namely:

- a. 18 USC 1956 - Laundering of Monetary Instruments;

I am a Special Agent of the Bureau of Alcohol Tobacco Firearms and Explosives and have been so employed in this capacity since 2005. During the course of my employment I have received specific training and have obtained experience in investigations of Federal currency violations including money laundering.

Based upon my training, experience, investigative efforts, and information and insight given to me by other Special Agents of the Bureau of Alcohol Tobacco Firearms and Explosives and the Columbus Division of Police, I submit there is probable cause to believe that Maurice JEFFRIES:

1. Used proceeds derived from the sale of marijuana, a specified unlawful activity, to purchase the 2002 Isuzu Axiom.
2. Caused said vehicle to be titled, registered, or otherwise held in a nominee name.

III.

Origin of Investigation

On or about April 13, 2011 a Columbus Police Department (CPD) Confidential Informant (CI) provided information about Maurice JEFFRIES and an unknown white male who were dealing in large quantities of marijuana, approximately 1500 pounds at a time. Detectives were directed to the Yorkland Road area of Columbus, Ohio. The CI

directed officers to an apartment building on Yorkland Road and stated Jeffries had several apartments in the building.

IV.
Independent Investigation

Evidence of Maurice JEFFRIES Drug Trafficking Activity

1. On or about April 13, 2011 a Columbus Police Department (CPD) Confidential Source (CS) provided information about Maurice JEFFRIES and a white male known as "B," later identified as Brandon ALEXANDER, dealing large quantities of marijuana, approximately 1500 pounds at a time. Detectives were directed to the Yorkland Road area of Columbus, Ohio. The CI directed officers to an apartment building on Yorkland Road and stated JEFFRIES had several apartments in the building.
2. During the course of the investigation CPD detectives received anonymous information that the residents at 1380 Yorkland Rd Apartment B and 1386 Yorkland Road Apartment B were trafficking narcotics day and night. The source further stated that the occupants of the listed addresses have engaged in at least one gunfight with a rival group.
3. Columbus Police detectives conducted surveillance on the two Yorkland apartments and determine marijuana was being dealt from these two locations. CPD detectives spoke with an unidentified neighbor who stated Maurice JEFFRIES and his brother "Quan" were trafficking drugs from their apartments at 1380 Yorkland Rd Apartment B and 1386 Yorkland Road Apartment B. He/she stated at times they are so busy you could not get into the apartment complex parking lot. CPD Detectives were able to determine that 1386 Yorkland Road Apartment B as the listed home address of Maurice JEFFRIES, and 1380 Yorkland Road Apartment B as the listed home address of his brother LaQaun JEFFRIES.
4. On or about August 8, 2011, a CPD Confidential Informant (CI) proceeded to 1386 Yorkland Road Apartment B. Maurice JEFFRIES exited 1380 Yorkland Rd Apartment B and instructed the CI to this apartment, and the CI entered 1380 Yorkland Rd Apartment B and purchased a quantity of marijuana with pre-recorded city funds.
5. On or about August 18, 2011, CPD Detectives obtained State search warrants for both 1380 Yorkland Rd Apartment B and 1386 Yorkland Rd Apartment B. The State search warrants were executed on August 19, 2011. A portion of the items seized from 1380 Yorkland Rd Apartment B consisted of:
 - Between 4 and 5 pounds of suspected marijuana;
 - Suspected cocaine residue;

- Occupancy papers for LaQuan JEFFRIES;
- An electronic money counter;
- Approximately \$2050 in cash;
- A digital scale;
- A Colt, .357 caliber revolver with 6 rounds of ammunition;
- A Smith & Wesson, .40 caliber pistol with 13 rounds of ammunition;
- A D.C. Industries, 7.62 caliber rifle with 30 rounds of ammunition;
- An 7.62 caliber drum magazine with 59 rounds of ammunition; and
- A laptop computer.

A portion of the items seized from 1386 Yorkland Rd Apartment B consisted of:

- Approximately \$120,934 in cash (in various locations);
- Approximately 77 pounds of marijuana;
- Occupancy papers for Maurice Jefferies
- Five digital scales;
- A SWD, 9 mm caliber pistol with 23 rounds of ammunition;
- A Ruger, .22 caliber pistol with 10 rounds of ammunition;
- A Taurus, .45 caliber pistol with 3 rounds of ammunition;
- A Mossberg, .30-30 caliber rifle with 2 rounds of ammunition;
- A Taurus, .40 caliber pistol;
- A bullet proof vest;
- A Romarm, 7.62 caliber rifle with 3 rounds of ammunition and a drum magazine;
- Two Steyr, .308 caliber rifles;
- A DPMS, .223 caliber rifle;
- A Penn Arms, 12 gauge shotgun with 10 rounds of ammunition;
- Multiple rounds of ammunition and magazines both loaded and empty; and
- Miscellaneous documents.

In connection with the above activity Maurice JEFFRIES was arrested and subsequently released on bond.

6. On or about October 28, 2011 CPD detectives/officers spoke to a neighbor who stated JEFFRIES had moved his narcotics operation to 1378 Yorkland Rd. Apt. B. CPD detectives/officers conducted surveillance and observed a pattern of activity consistent with narcotics trafficking. Surveillance was also able to place JEFFRIES at this location during various hours of the day and night. JEFFRIES during the surveillance activity was also observed moving between 1378 Yorkland Rd. Apt. B and 1481 Orchard Park Drive which from door to door is approximately 100 yards apart. CPD detectives also observed vehicles JEFFRIES had parked at 1380 Yorkland Rd. Apt. B now parked in front of 1481 Orchard Park Drive.

7. CPD detectives then began surveillance on 1481 Orchard Park Drive. Detectives were also able to place JEFFRIES at this location during various hours of the day and night. Detectives on one of these surveillances observed an unidentified male/black carry a large black duffel bag into the residence that he retrieved from a white Chevrolet truck. The male black then left a short time later without the bag. CPD detectives conducted a computer search of this residence and found a female using the name Shavonne Jefferies with no date of birth or social security number and Gavin WEBSTER, who has a criminal history of narcotics and weapon offenses, have used this address in the recent past. WEBSTER has been arrested with JEFFRIES in the recent past with a large quantity of narcotics and firearms. In June 2007, ATF and CPD began investigating WEBSTER, who was dealing crack cocaine from 2227 Durant Avenue, Columbus, Ohio. Officers conducted surveillance on the residence and also observed JEFFRIES at this address several times. On June 13, 2007, a CPD CI purchased an amount of crack cocaine at 2227 Durant Ave. The CI paid Dennis ANDREWS for the crack and JEFFRIES assisted in the transaction by handing the CI the baggie of crack cocaine. The CI advised that WEBSTER was present during the transaction and that WEBSTER ran the dope spot (2227 Durant Ave.). On June 14, 2007, a State search warrant was executed at 2227 Durant Ave. and among the individuals detained inside the residence were WEBSTER and JEFFRIES. Agents and Officers recovered a loaded Ruger, Model P-95, Pistol, serial number 312-58513, approximately 250 grams of crack cocaine, digital scales, and U.S. currency. WEBSTER advised officers that his girlfriend stays at 2227 Durant Ave. and that he does stay here at the apartment sometimes. JEFFRIES advised officers that WEBSTER was his brother-in-law.
8. On or about November 16, 2011, continued surveillance of 1481 Orchard Park Drive revealed two rental vehicles with unknown male/blacks parked in the parking area that appeared to be waiting for someone. CPD detectives observed one of JEFFRIES' known vehicles arrive with a male/black driving. Detectives were unable to positively identify JEFFRIES as the driver of the vehicle. This male carried several bags into the residence using the garage door to gain entry. This male then engaged the drivers of the two rental vehicles in a short conversation. These two rental vehicles then departed and were followed to an apartment off of College Avenue in Columbus, Ohio where both drivers entered the apartment. CPD detectives spoke with the management of this complex, who stated they were aware of suspicious activity occurring in the area of that apartment. Detectives continued the surveillance of 1481 Orchard Park Drive. They observed JEFFRIES return to this address and then drive across the street to 1378 Yorkland Rd. Apt B.
9. On or about November 29, 2011, detectives conducted stationary surveillance on the residence at 1481 Orchard Park Drive and 1378 Yorkland Rd Apt B. At approximately 11am, detectives observed JEFFRIES exit 1378 Yorkland Rd Apt B. carrying a red gym-type bag, which appeared to be empty. JEFFRIES then walked across the street and entered 1481 Orchard Park Drive. At 11:30am

JEFFRIES departed the Orchard Park Drive address carrying the same gym bag. The gym bag now appeared to contain an unknown object or objects. JEFFRIES was very cautious as he walked back across the street. He continually looked up and down the street and closely watched vehicles as they passed by. JEFFRIES demeanor was very different from when the bag was empty. JEFFRIES walked directly to 1378 Yorkland Rd Apt B. and used a key to gain entry.

10. On or about December 1, 2011, CPD detectives obtained State search warrants for both 1378 Yorkland Rd Apartment B and 1481 Orchard Park Drive. The State search warrants were executed on December 2, 2011. A portion of the items seized from 1378 Yorkland Rd Apartment B consisted of:

- Approximately \$2705 in cash;
- 2 cellular telephones;
- 3 digital cameras;
- Miscellaneous records;
- A Taurus, .38 caliber revolver;
- A Smith & Wesson, .45 caliber pistol;
- A Norinco, SKS, 7.62 caliber rifle;
- A digital scale; and
- 4 separate baggies of distribution quantities of suspected marijuana (ranging in quantities from 2.12 to 4.4 grams).

A portion of the items seized from 1481 Orchard Park Drive consisted of:

- \$107,992 in cash (\$98,000 of this cash was concealed in a new furnace pipe which appeared to be professionally added to the furnace. The pipe had duct tape on the seams which concealed an access panel to this furnace pipe);
- A laptop computer;
- Occupancy papers in the name of Gavin WEBSTER;
- A money counter;
- 4 digital scales;
- An identification maker;
- In excess of 130 pounds of suspected marijuana;
- Miscellaneous photos with WEBSTER and JEFFRIES together;
- A Smith & Wesson, .40 caliber pistol;
- A Ruger, .45 caliber pistol;
- A Smith & Wesson, 9 mm caliber pistol; and
- Miscellaneous ammunition and magazines.

In connection with the above activity Maurice Jefferies was again arrested and is currently detained.

Support of Probable Cause of Maurice Jeffries and Tatiana Turner's Money Laundering Activity

Upon being questioned by pre-trial services Maurice JEFFRIES stated for the last six years he has sold electronic stereo equipment for a living.

Tatiana TURNER who is currently 26 years old and the girlfriend/mother of two of JEFFRIES' children stated she has known JEFFRIES since she was 13 years of age and has never known JEFFRIES to work or knew that he was selling electronic stereo equipment.

As part of the continuing investigation into JEFFRIES and TURNER's criminal activities the following information has been discovered:

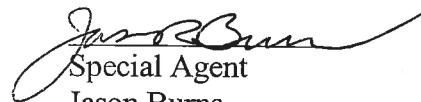
1. JEFFRIES and TURNER purchased a house located at 6060 Brook Bay Court Canal Winchester, Ohio 43110. According to the deed it was purchased on April 18, 2011 for a price of \$40,007. I was unable to locate a mortgage associated with this property.
2. On or about March 10, 2011 Tatiana Turner purchased a \$40,000 cashier's check from Chase Bank with cash that was used to purchase 6060 Brook Bay Court Canal Winchester, Ohio 43110.
3. Tatiana TURNER filed bankruptcy on March 3, 2009, her signed bankruptcy petition reflected a monthly take home pay of \$1523.00 a month.
4. Tatiana TURNER during 2010 received emergency rent assistance from the Franklin County Job and Family Services Agency.
5. TURNER has a 1986 Chevrolet Monte Carlo, Serial Number 1G1GZ37H9GR211763, Ohio license plate number FHW-4472, maroon in color in her name which is reflected as being purchased on April 4, 2005. The vehicle title lists Maurice JEFFRIES as the previous owner who gifted the vehicle to TURNER.
6. This vehicle was not listed as an asset on TURNER's bankruptcy filing although it had a current registration with the State of Ohio in her name.
7. This vehicle was first observed during the execution of the search warrants at 1380 and 1386 Yorkland Rd on August 19, 2011. CPD officers described the condition of the vehicle as rough and not operational. The hood was up, and parts of the motor were missing from the vehicle and additional parts were lying on the floor of the garage.

8. This same vehicle was observed in the garage of 1378 Yorkland Rd., Apartment B during the execution of the December 2, 2011 search warrant. It was noted that this vehicle is now believed to be worth \$15,000 to \$20,000. This figure is based upon the upgrades to this vehicle which consisted of a new custom flake paint job, a custom chrome accessorized engine, upgraded custom leather interior, and custom chrome spinner rims.
9. TURNER has a 2002 Isuzu Axiom, Serial Number 4S2DF58X524605162, Ohio license plate number FCQ3646, white in color currently registered in her name which is reflected as being purchased on 9/13/2010. The title reflects it was a gift from Corey Whitehouse of Zanesville, Ohio. A previous title of this vehicle reflects Whitehouse purchased the 2002 Isuzu Axiom on 1/19/2010 for \$4675. On 3/12/2012, a co-conspirator of JEFFRIES was interviewed and shown a picture of the Isuzu Axiom. This co-conspirator stated that the car belonged to JEFFRIES and that he/she had driven the car on occasion. This co-conspirator stated that JEFFRIES bought the car in Zanesville and paid approximately \$4,500 in cash for the car. This co-conspirator was shown a photograph of Corey Whitehouse. The co-conspirator advised that the photograph was his friend Corey, from Zanesville, and that Corey was the guy who sold the Isuzu Axiom to JEFFRIES and that he/she introduced JEFFRIES to Corey Whitehouse. The co-conspirator advised that JEFFRIES liked the rims on the Isuzu when he first saw it.
10. The US Postal Service mail carrier for 6060 Brook Bay Court Canal Winchester, Ohio 43110 was interviewed. He/she stated an individual by the name of TURNER was receiving mail at that address. The carrier also upon questioning informed agents during the summer of 2011 he/she observed contractors performing work on that residence.
11. On or about December 7, 2011 Maurice JEFFRIES as the Grantor signed a quitclaim deed transferring the property at 6060 Brook Bay Court Canal Winchester, Ohio 43110 to Tatiana TURNER making her the sole owner of that property. According to the deed, 6060 Brook Bay Court Canal Winchester, Ohio 43110 is the tax mailing address of Tatiana TURNER.
12. A Federal search warrant was executed on the residence at 6060 Brook Bay Court Canal Winchester, Ohio 43110 on January 6, 2012. Your affiant observed at that time what appeared to be extensive upgrades to the residence consisting of a new roof, hot water tank, furnace, drywall work and painting.

VI.
CONCLUSION

In view of the above mentioned facts and my training and experience in the investigation of financial crimes, I have probable cause to believe that Maurice JEFFRIES is the true owner

of the 2002 Isuzu Axiom and that he purchased the motor vehicle with proceeds that he derived from the sale of narcotics. In addition, I believe JEFFRIES titled and registered the 2002 Isuzu Axiom in the name of Tatiana TURNER in an attempt to disguise and/or conceal the fact that he is the true owner of the motor vehicle, which is consistent with what he has done with other property. I therefore believe the property described in the section of this affidavit "Property to be Seized" is evidence of those crimes and should be seized as it is subject to forfeiture pursuant to 18 USC 981 and 982, as property involved in a violation of 18 USC 1956(a)(1)(B)(i), FURTHER AFFIANT SAYETH NAUGHT

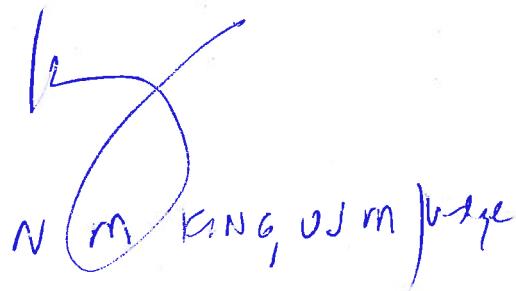

Special Agent
Jason Burns

STATE OF OHIO)

) SS

COUNTY OF FRANKLIN)

On this 29th day of March, 2012, personally appeared Jason Burns who, being duly sworn, upon his oath, signed the above affidavit.


N. M. KING, U.S. Magistrate